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November 7, 2016

VIA ECF

Judge Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Murphy v. LaJaunie
No. 13 CV 6503

Dear Judge Netburn:

Together with the Law Offices of Jeffrey E. Goldman, we are class counsel in the above-referenced matter. I write to respectfully request an adjournment of the deadline for Plaintiffs' damages inquest submission, which is currently November 9, 2016.

We seek this adjournment because we recently began settlement discussions with Defendant 15 John Corp.'s bankruptcy attorney and an additional legal advisor to Defendant Philippe Lajaunie that we believe will be productive. Mr. Lajaunie has agreed to produce detailed financial information by November 18, 2016 that will enable us to determine the full extent of his and the other Defendants' financial resources and evaluate the amount of money available to pay any settlement or judgment in this case. Based on the limited financial information we have already reviewed as well as the bankruptcy filings of 15 John Corp., it seems clear that there is indeed a limited pool of money from which the Class will be able to collect. As such, we request that Plaintiffs' damages inquest submission deadline be adjourned until two weeks after we notify the Court that settlement discussions have ended, but in any event no earlier than November 30, 2016. We further propose that we update the Court regarding the status of settlement discussions within 30 days.

This is the second request for an adjournment of this deadline, and the Court granted our first request. Defendant Lajaunie consents to the request.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Schulman', with a stylized flourish at the end.

Denise A. Schulman

cc: Philippe Lajaunie